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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 DMCA Subpoena to identify 13 Quizlet's users under 17 14 U.S. Code § 512	15 No. 2:25-mc-00010-WLH-E 16 REQUEST TO THE CLERK FOR ISSUANCE 17 OF SUBPOENA PURSUANT TO 17 U.S.C. § 18 512(h)
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19 Pursuant to 17 U.S.C. § 512(h), a provision of the Digital Millennium Copy-
20 right Act ("DMCA"), Applicant Barkley & Associates Inc. ("Barkley") hereby re-
21 quests that the Clerk of this Court issue a subpoena duces tecum directed to Quizlet,
22 Inc. (the "DMCA Subpoena"). Quizlet, Inc. who operates the website
23 <https://quizlet.com/> has hosted several users that sell bootlegged versions of Bar-
24 kley's copyright protected test prep books and exams.

25 This DMCA Subpoena Request is directed at Quizlet, Inc. ("Quizlet"), and
26 seeks information sufficient to ascertain the true identity of the users selling the boot-
27 legged versions of Barkley's copyright protected material. For a DMCA subpoena to
28 be issued, a copyright owner must satisfy each of the three requirements for issuance
of a DMCA subpoena set forth in 17 U.S.C. S 512(h)(2). Applicant Barkley has
complied with all of the requirements of Section 512(h)(2), namely: (1) Barkley has
filed a takedown notification with Quizlet and attached the notice to this filing (see
Exhibit 1 at ¶7, Declaration) (2) Barkley has submitted a proposed subpoena (see Ex-
hibit 2); and (3) A sworn declaration to the effect that the purpose for which the

1 subpoena is sought is to obtain the identity of an alleged infringer and that such in-
2 formation will only be used for the purpose of protecting rights under this title. (see
3 Exhibit 1 at ¶10, Declaration)

4 WHEREFORE, pursuant to 17 U.S.C. § 512(h)(4), Barkley respectfully re-
5 quests that the Clerk of this Court expeditiously issue and sign the proposed sub-
6 poena attached hereto as Exhibit 2 and return it to the undersigned counsel for ser-
7 vice on Quizlet.

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9 July 11, 2025

/s/ Brian Tamsut

Brian Tamsut

SoCal IP Law Group LLP

Attorneys for Barkley & Associates, Inc.